

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In Re Application of U S WEST, Inc.)
 and QWEST COMMUNICATIONS)
 INTERNATIONAL, INC.)
)
 For an Order Disclaiming Jurisdiction, or)
 In the Alternative, Approving the U S WEST, INC.)
 -- QWEST COMMUNICATIONS INTERNATIONAL)
 INC. Merger)
 _____)

Docket No. UT-991358

TESTIMONY OF
ROBERT L. JONES
ON BEHALF OF
QWEST CORPORATION
February 27, 2002

1 Q. PLEASE STATE YOUR NAME.

2 A. My name is Robert L. Jones. I am a Senior Vice President in the Northwest
3 Network Operations Division at Qwest Communications in Washington.

4

5 Q. PLEASE DESCRIBE YOUR BACKGROUND AND WORK EXPERIENCE.

6 A. I have been employed by Qwest Communications or its predecessors since 1986
7 and in my current assignment since 2000. I began my career in
8 telecommunications in 1982 as a Commission Advisor to the California Public
9 Utility Commission. At Qwest (and its predecessors) I have held the titles of
10 Financial Manager, Sales Manager, Director, and Vice President in the Small
11 Business Group, Consumer Sales and Service Delivery Division, Consumer Sales
12 and Collections Division, and Network Services Department. My current
13 executive responsibilities consist of engineering, construction, installation, and
14 maintenance of fiber and copper based communication networks for high-speed
15 broadband Internet and voice services. I have designed and implemented
16 strategies for achieving consistently strong service performance by utilizing
17 advanced system and network technologies to increase operational efficiencies.

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19 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

20 A. The purpose of this testimony is to respond to various statements included in the
21 Testimony of Glenn Blackmon submitted in this matter on February 22, 2002, and
22 in the verified comments of Public Counsel, submitted the same day.

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24 Q. DID THE COMPANY CONDUCT A SELECTIVE REVIEW OF THE REPORTED
25 DATA IN ORDER TO REDUCE THE REPORTED NUMBER OF FAILURES AS
26 DR. BLACKMON ALLEGES AT PAGE 1 OF HIS TESTIMONY?

1 **A.** No, the company completed a very detailed review of each ticket not closed
2 within two business days to determine what it could have done differently. As
3 previously stated, 1,381 of the 1,435 reports were reviewed. Qwest was unable to
4 isolate 54 of the trouble reports.¹ It was this review that resulted in the conclusion
5 that for at least 60% of the tickets not closed within two business days the
6 company did everything it reasonably could have done in order to meet the two
7 day standard.

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9 **Q.** **WHAT DO YOU MEAN WHEN YOU SUGGEST THAT THE COMPANY DID**
10 **EVERYTHING IT REASONABLY COULD HAVE DONE IN ORDER TO MEET**
11 **THE TWO DAY STANDARD FOR 60% OF THE TROUBLE REPORTS NOT**
12 **CLOSED WITHIN TWO BUSINESS DAYS?**

13 **A.** 486 (39.7%) of the reports were due to major cable damages. Qwest worked
14 twenty-four hours a day, each day (including Sundays) to restore service. In other
15 words, the unusual circumstances associated with restoration of these trouble
16 reports prevented Qwest from restoring service within two business days.

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18 In addition, 242 (19.8%) of the reports were not restored within two business days
19 due to the need to access the customer's premise and the customer was
20 unavailable. Again the circumstances associated with the restoration of service

¹ Q. Public Counsel, at footnote 2 of its comments, states that the result of Qwest's manual analysis amounts to 1435 orders analyzed rather than 1381. Could you please respond?

A. Yes. There were actually 1435 reports not closed within 2 days in 2001. 1381 were reviewed and 54 could not be located for review. The 54 were inadvertently listed twice in the petition, once separately and then they were included again in the category of "other reasons". The petition should be corrected to reflect that there were 54 reports not found and only 73 reports (not 127) that were delayed for "other reasons".

1 for these specific reports was unusual since in 2001, 84% of Qwest's trouble
 2 reports were cleared without the need for access to the customer's premises.
 3 These specific reports typically resulted in a Qwest technician being dispatched to
 4 the customer premises within the two working days and once at the customer
 5 premises the technician determined they could not restore service without
 6 accessing the customer's premises. This occurred after the technician tried several
 7 alternative means to restore service and was unsuccessful. At this point the
 8 technician determined the problem was within the customer's premises, was
 9 unable to access the premises and therefore could not complete the repair. Again,
 10 Qwest did everything it could predictably do to restore service within two
 11 working days.

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 13 **Q. DO YOU AGREE WITH DR. BLACKMON'S PORTRAYAL OF THE CREDIT**
 14 **AMOUNTS OWED UNDER THE CURRENT MEASURE AT EXHIBIT 275?**

15 **A.** No. Dr. Blackmon's first calculation includes repair tickets left open in error by
 16 Qwest technicians. These trouble reports **were** completed within two working
 17 days and therefore should be included in the results stating the number of trouble
 18 reports cleared in two working days. Following are Qwest's results when those
 19 reports are reflected as closed within two working days:

Month	Total # of out of service tickets	# of tickets out of service less than two working days	# of tickets completed but not closed within two working days	revised # of tickets out of service less than two working days	% less than two working days	# missed (less than two working days)	% missed (less than two working days)
January	23,505	23,295	87	23,382	99.48%	123	0.52%
February	19,483	19,041	16	19,057	97.81%	426	2.19%
March	20,754	20,692	4	20,696	99.72%	58	0.28%
April	20,372	20,328	5	20,333	99.81%	39	0.19%

May	19,953	19908	3	19,911	99.79%	42	0.21%
June	20,334	20232	17	20,249	99.58%	85	0.42%
July	18,873	18759	9	18,768	99.44%	105	0.56%
August	21,006	20917	31	20,948	99.72%	58	0.28%
September	16,343	16277	14	16,291	99.68%	52	0.32%
October	17,931	17875	12	17,887	99.75%	44	0.25%
November	17,748	17697	4	17,701	99.74%	47	0.26%
December	16,934	16780	9	16,789	99.14%	145	0.86%
Total	233,236	231,801	211	232,012	99.48%	1,224	0.52%

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2 **Q. DR. BLACKMON ALLEGES THAT QWEST HAS IGNORED "THE TROUBLE**
3 **TICKETS THAT ERRONEOUSLY SHOW GOOD PERFORMANCE." HE**
4 **FURTHER STATES THAT THE "TROUBLE TICKETS BEING IGNORED ARE**
5 **THOSE WHERE QWEST CLOSED A TROUBLE TICKET IN ERROR, WHEN**
6 **THE TROUBLE WAS NOT ACTUALLY CLEARED." IS HE CORRECT?**

7 **A.** No, those reports are included in the results above. Furthermore, Qwest does not
8 close any trouble report until it either clears the trouble or if it cannot find any
9 trouble after repeated tests. In most instances Qwest does not close the trouble
10 report until the customer confirms the trouble condition is resolved or a technician
11 is dispatched to the premises to confirm from the customer premises that the
12 customer has proper dial tone. If the customer is not available this confirmation
13 is done at the network interface. If the network interface is not available (i.e. "no
14 access") then a door hanger is left at the premises requesting the customer contact
15 the company to schedule an appointment.

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17 **Q. DR. BLACKMON STATES ABOUT "20% OF ALL CUSTOMERS WHO REPORT**
18 **OUT-OF-SERVICE CONDITIONS END UP MAKING A SECOND TROUBLE**
19 **REPORT TO THE COMPANY AFTER THE PROBLEM IS SUPPOSEDLY**
20 **FIXED." HE FURTHER STATES THAT "GIVEN THE SHEER NUMBERS OF**

1 **TROUBLE REPORTS THAT ARE RECORDED AS RESTORED WITHIN TWO**
2 **WORKING DAYS, IT IS CLEAR THAT MORE TICKETS ARE CLOSED IN**
3 **ERROR THAN THE FEW LEFT OPEN IN ERROR." DO YOU AGREE?**

4 **A.** No. As previously stated, Qwest does not close any trouble report until it either
5 clears the trouble or if it cannot find any trouble after repeated tests. Trouble
6 reports categorized as "repeat reports" are not tickets closed in error. In 2001,
7 approximately 18% of all Washington customers who reported trouble filed
8 another trouble report within thirty days. Qwest categorizes these reports as
9 "repeat trouble" reports to identify those company facilities that have recurring
10 trouble. However, these reports are generally for a new and different trouble
11 condition, not the same condition previously reported.

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13 **Q.** **WHY DO YOU BELIEVE THE 486 REPORTS CAUSED BY MAJOR CABLE**
14 **OUTAGES, NOT CURRENTLY EXCLUDED FROM THE PERFORMANCE**
15 **MEASUREMENT, WERE DUE TO EXCEPTIONAL OR UNUSUAL**
16 **CIRCUMSTANCES?**

17 **A.** In 2001, Qwest received many trouble reports caused by persons or entities other
18 than the company which are exceptions permitted under the existing program.
19 The majority of the trouble reports related to major outages were restored within
20 two working days in 2001. A detailed analysis of 486 trouble reports not restored
21 within two working days associated with major cable damage was caused by one
22 of two conditions: (1) the extent of the damage and the circumstances that
23 occurred during restoration of service; or (2) a delay in closure of the trouble
24 report because Qwest was unable to confirm with the customer that the trouble
25 condition was cleared.

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When Qwest is unable to confirm with a customer that the trouble condition no longer exists, Qwest generally must dispatch a technician to confirm proper dial tone at the customer's premises. Qwest does not close the trouble report until this confirmation occurs. It was the need to confirm restoration with the customer that precluded closure of the trouble report. The 114 trouble reports below are residual tickets from major cable damage consisting of over 100+ tickets per damage. This is why the small number looks odd when associated with a major cable outage.

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- 27 (5.6%) trouble reports were due to a major cable cut in Tacoma Lenox in June.
- 4 (0.8%) trouble reports were due to a major cable cut in Tacoma in September.
- 4 (0.8%) trouble reports were due to a major cable cut in Kent in September.
- 4 (0.8%) trouble reports were due to a major cable cut in Bellevue Sherwood in October.
- 4 (0.8%) trouble reports were due to a major cable cut in Issaquah in October.
- 1 (0.2%) trouble reports were due to a major cable cut in Bellingham in October.
- 23 (4.7%) trouble reports were due to a major cable cut in Issaquah in December.
- 41 (8.4%) trouble reports were due to a major cable cut in Vancouver Orchards in December.
- 4 (0.8%) trouble reports were due to a major cable cut in Spokane Fairfax in December.
- 2 (0.4%) trouble reports were due to a major cable cut in Seattle Cherry in December.

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The length of time to restore service outages associated with the major cable outage in Renton was unusual, as were the circumstances associated with this restoration effort. Specifically, 372 of the 486 (76.5%) trouble reports not closed within two working days were due to a major cable cut in Renton. As stated in the original petition, while repairing the 900 pair cable section over 1,000 feet

1 long, the cable duct collapsed. The collapse of the cable duct forced Qwest to
 2 excavate the entire cable section, replace the duct and splice in new cable along a
 3 new cable path. This is not the usual approach to restoration of a cable cut.
 4 Normally the company is able to simply splice the section of the cable that is cut
 5 and does not replace the entire cable section (1,000 feet). When the section of
 6 cable is spliced, the company generally restores services within two working
 7 days.

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9 **Q. IF YOU REMOVE THE TROUBLE REPORTS DUE TO MAJOR CABLE CUTS**
 10 **THAT COULD NOT BE RESTORED WITHIN TWO WORKING DAYS DUE TO**
 11 **UNUSUAL OR EXCEPTIONAL CIRCUMSTANCES, WHAT WOULD THE**
 12 **RESULTS FOR 2001 BE?**

13 **A.** Qwest would have completed 99.68% of all trouble reports within two working
 14 days. Following are the restated monthly results that exclude tickets caused by
 15 major cable cuts that could not be restored within two working days due to
 16 unusual or exceptional circumstances:

Month	Total # of out of service tickets	# of tickets missed due to major cable cuts	revised # of total tickets out of service less than two working days	# of tickets out of service less than two working days	# of tickets completed but not closed within two working days	revised # of tickets out of service less than two working days	% less than two working days	revised # missed (less than two working days)	% missed (less than two working days)
January	23,505		23,505	23,295	87	23,382	99.48%	123	0.52%
February	19,483	372	19,111	19,041	16	19,057	99.72%	54	0.28%
March	20,754		20,754	20,692	4	20,696	99.72%	58	0.28%
April	20,372		20,372	20,328	5	20,333	99.81%	39	0.19%
May	19,953		19,953	19,908	3	19,911	99.79%	42	0.21%
June	20,334	27	20,307	20,232	17	20,249	99.71%	58	0.29%
July	18,873		18,873	18,759	9	18,768	99.44%	105	0.56%
August	21,006		21,006	20,917	31	20,948	99.72%	58	0.28%
September	16,343	8	16,335	16,277	14	16,291	99.73%	44	0.27%
October	17,931	9	17,922	17,875	12	17,887	99.80%	35	0.20%

November	17,748		17,748	17697	4	17,701	99.74%	47	0.26%
December	16,934	70	16,864	16780	9	16,789	99.56%	75	0.44%
Total	233,236	486	232,750	231,801	211	232,012	99.68%	738	0.32%

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2 **Q. WHY DO YOU BELIEVE THE 242 (19.8%) REPORTS NOT CLOSED DUE TO**
 3 **THE NEED TO ACCESS THE CUSTOMER'S PREMISE WERE DUE TO**
 4 **EXCEPTIONAL OR UNUSUAL CIRCUMSTANCES?**

5 **A.** Access to the customers premise is typically not an unusual circumstance. In
 6 2001, Qwest required access to the customer premises for approximately 37,300
 7 (16%) trouble reports.

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9 These trouble reports represent less than one percent (0.6%) of the total number of
 10 tickets that required access to the customer's premises for service restoration.

11 What is unusual about these trouble reports is that after Qwest's first dispatch to
 12 repair the customers service and access is not obtained, Qwest is not able to
 13 reschedule an appointment with the customer within the 48-hour window.

14 Unusual circumstances also occur when the customer has requested a later
 15 appointment (beyond the 48-hour interval) or the customer's vendor requests a
 16 longer duration.

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18 Unusual circumstances associated with "no premises access reasons" occur when
 19 the network interface is located in a garage or basement, there is no access to the
 20 backyard due to vicious dogs or locked gates, for businesses there may be a
 21 locked terminal rooms with no site manager available, etc. Qwest required access
 22 to resolve the trouble condition associated with these trouble reports only after it
 23 could not restore service at the premises when all other options had expired. In

1 other words, Qwest did not originally believe it would require access based on the
 2 trouble condition reported by the customer and once at the premises determined
 3 service restoration could not occur absent such access.

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5 **Q. IF YOU REMOVE THE TROUBLE REPORTS THAT COULD NOT BE**
 6 **RESTORED WITHIN TWO WORKING DAYS DUE TO UNUSUAL OR**
 7 **EXCEPTIONAL CIRCUMSTANCES ASSOCIATED WITH ACCESS TO THE**
 8 **CUSTOMER'S PREMISES, WHAT WOULD THE RESULTS FOR 2001 BE?**

9 **A.** Qwest would have completed 99.58% of all trouble reports within two working
 10 days. Following is the restated monthly results that exclude tickets caused by
 11 major cable cuts that could not be restored within two working days due to
 12 unusual or exceptional circumstances:

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Month	Total # of out of service tickets	# of tickets missed due to customer reasons	revised # of total tickets out of service less than two working days	# of tickets out of service less than two working days	# of tickets complete d but not closed within two working days	revised # of tickets out of service less than two working days	% less than two working days	revised # missed (less than two working days)	% missed (less than two working days)
January	23,505	26	23,479	23,295	87	23,382	99.59%	97	0.41%
February	19,483	20	19,463	19,041	16	19,057	97.91%	406	2.09%
March	20,754	32	20,722	20,692	4	20,696	99.87%	26	0.13%
April	20,372	8	20,364	20,328	5	20,333	99.85%	31	0.15%
May	19,953	16	19,937	19908	3	19,911	99.87%	26	0.13%
June	20,334	20	20,314	20232	17	20,249	99.68%	65	0.32%
July	18,873	25	18,848	18759	9	18,768	99.58%	80	0.42%
August	21,006	21	20,985	20917	31	20,948	99.82%	37	0.18%
September	16,343	21	16,322	16277	14	16,291	99.81%	31	0.19%
October	17,931	17	17,914	17875	12	17,887	99.85%	27	0.15%
November	17,748	15	17,733	17697	4	17,701	99.82%	32	0.18%
December	16,934	21	16,913	16780	9	16,789	99.27%	124	0.73%
Total	233,236	242	232,994	231,801	211	232,012	99.58%	982	0.42%

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1 Q. IF YOU REMOVE THE TROUBLE REPORTS THAT COULD NOT BE
 2 RESTORED WITHIN TWO WORKING DAYS DUE TO UNUSUAL OR
 3 EXCEPTIONAL CIRCUMSTANCES ASSOCIATED WITH ACCESS TO THE
 4 CUSTOMER'S PREMISES AND MAJOR CABLE CUTS, WHAT WOULD THE
 5 RESULTS FOR 2001 BE?

6 A. Qwest would have completed 99.79% of all trouble reports within two working
 7 days. Following are the restated monthly results that exclude tickets caused by
 8 major cable cuts or that could not be closed due to customer reasons that could
 9 not be restored within two working days due to unusual or exceptional
 10 circumstances:

Month	Total # of out of service tickets	# of tickets missed due to customer reasons	# of tickets missed due to major cable cuts	revised # of total tickets out of service less than two working days	# of tickets out of service less than two working days	# of tickets complet ed but not closed within two working days	revised # of tickets out of service less than two working days	% less than two working days	revised # missed # (less than two working days)	% missed (less than two working days)
January	23,505	26		23,479	23,295	87	23,382	99.59%	97	0.41%
February	19,483	20	372	19,091	19,041	16	19,057	99.82%	34	0.18%
March	20,754	32		20,722	20,692	4	20,696	99.87%	26	0.13%
April	20,372	8		20,364	20,328	5	20,333	99.85%	31	0.15%
May	19,953	16		19,937	19908	3	19,911	99.87%	26	0.13%
June	20,334	20	27	20,287	20232	17	20,249	99.81%	38	0.19%
July	18,873	25		18,848	18759	9	18,768	99.58%	80	0.42%
August	21,006	21		20,985	20917	31	20,948	99.82%	37	0.18%
September	16,343	21	8	16,314	16277	14	16,291	99.86%	23	0.14%
October	17,931	17	9	17,905	17875	12	17,887	99.90%	18	0.10%
November	17,748	15		17,733	17697	4	17,701	99.82%	32	0.18%
December	16,934	21	70	16,843	16780	9	16,789	99.68%	54	0.32%
Total	233,236	242	486	232,508	231,801	211	232,012	99.79%	496	0.21%

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13 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

1 A. Yes, it does.

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